



November 2, 2015

Re: Response to Comments on Draft RI/FS Work Plan
Columbia Falls Aluminum Company

Roux Associates, Inc. (Roux Associates), on behalf of Columbia Falls Aluminum Company (CFAC), has prepared this response to the written comments provided by EPA, on behalf of Montana DEQ, during the October 7 and 8, 2015 technical meeting. Each of the comments are presented below in italic font, followed by Roux Associates' response.

1) General comment: The RI/FS work plan makes various assertions about what might have been covered by the MPDES permit. DEQ has not had a chance to fully evaluate the accuracy of these assertions. DEQ recommends that the discussions regarding MPDES permit coverage be deleted unless it is critical to the discussion. DEQ also recommends that EPA include a comment that approval of the RI/FS work plan, once revised, is not intended to be an agreement as to CFAC's interpretation of the MPDES permit.

Roux Associates and CFAC believe the discussion provided regarding the MPDES permit is critical information to be included in the RI/FS Work Plan as it provides important regulatory background with respect to environmental conditions at the Site. The RI/FS Work Plan was revised taking into consideration the comments provided by DEQ herein and during the October 7 and 8, 2015 technical meeting held at the CFAC Site.

2) General Comment: DEQ has not seen the most recent version of the draft Scope of Work. However, the last version that DEQ reviewed did not include language regarding DEQ consultation in reviewing and approving documents. Please ensure that the revised RI/FS work plan discusses DEQ review and comment, along with EPA review and approval.

Section 9.0 of the RI/FS Work Plan was revised to include language discussing submittal of documents to the regulatory agencies, along with EPA review and approval.

3) Page ES-3: Please clarify that all documents, including any interim action work plans, human health risk assessment work plan and report, FS work plan and report, etc., will be submitted to the agencies for review and approval. Please revise throughout.

The executive summary of the RI/FS Work Plan was revised to include language related to DEQ review and comment, along with EPA review and approval.

4) *Section 2.1: Please revise this sentence as follows: "Portions of The Site is ~overned by a Montana Pollutant Discharge Elimination System (MPDES) permit."*

Alternate language was provided in Section 2.1 that CFAC and Roux Associates believe is accurate and factual.

5) *Section 2.7.2: Please delete the discussion of the discharges allowed under the MPDES permit. This discussion is not entirely accurate, and the MPDES permits speak for themselves.*

The language provided in Section 2.7.2 was deleted and revised language was included that CFAC and Roux Associates believe is accurate and factual.

6) *Section 2.8.9: This section refers an EPA Regional Screening Level of 1,600 mg/kg for cyanide, however, the cyanide residential RSL for soil is 2.7 mg/kg. Please revise.*

Section 2.8.9 provides a summary of the findings of a historical investigation. Section 2.8.9 was revised to clarify that the EPA Regional Screening Level being compared to was the screening level used at the time of the investigation.

7) *Section 2.8.11: Please revise this section. The facility was listed on the CECRA priority list in 1989, not 1999. Also, the facility has been referred from the CECRA priority list to the Hazardous Waste Program, not the MPDES permitting program.*

Section 2.8.11 was revised as requested in Comment #7.

8) *Section 3.6: The ARARs need to be identified by EPA and DEQ. This section needs to be replaced by the Agencies' identification of ARARs. Also, the NCP is not typically identified as an ARAR and thus should be deleted.*

As discussed during the technical meeting held on October 7 and 8, 2015, the language provided in the ARAR section of the RI/FS Work Plan was revised. Additionally, the NCP was removed as a potential ARAR as requested.

9) *Page 46, Section 3.2.6.3: Please delete the statement that the seep was permitted as an outfall in the 1994 permit. This is not entirely accurate.*

The statement in Section 3.2.6.3 was deleted as requested.

10) Section 9.0: This section needs to include deadlines for all documents and submittal to the agencies for review and approval.

A deliverable table with deadlines for all submittals is provided in the revised RI/FS Work Plan.